

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE:)	CHAPTER 13
)	
TIMOTHY GRANT SPENCER)	CASE NO. 19-41859
)	
Debtor.)	RUSS KENDIG
)	U.S. Bankruptcy Judge
)	

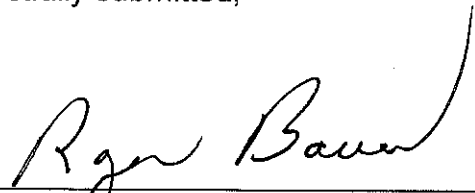
MOTION TO WITHDRAW AS COUNSEL OF RECORD

Now comes ROGER R. BAUER who respectfully requests this Court for an Order withdrawing ROGER R. BAUER as counsel of record in this matter.

As grounds for said Motion, counsel states that Debtor, Timothy Grant Spencer, has failed to follow the rules and regulations set forth by the federal bankruptcy court, including, but not limited to, Debtor has failed to make the required monthly payments for March and April, without justifiable cause and Debtor entered into a new housing lease agreement, increasing his rent from \$730.00 to \$1,620.00, a significant increase of \$890.00 per month. Debtor did not receive permission from the federal bankruptcy court to determine if said lease agreement was allowed or reasonable.

WHEREFORE, counsel states Debtor, Timothy Grant Spencer, has failed to show commitment, perseverance, stability or sacrifice upon completing his Chapter 13 obligations causing irreconcilable differences between counsel and debtor.

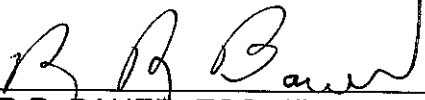
Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Withdraw as Counsel and attachments was served electronically and/or by regular U.S. Mail, postage prepaid, on this 4th day of May, 2020 to Michael A. Gallo, Trustee.



ROGER R. BAUER, ESQ. (#0015998)
Attorney for Debtor